

BATHAE DUNNE LLP

Yavar Bathae (CA 282388)
Andrew C. Wolinsky (CA 345965)
445 Park Avenue, 9th Floor
New York, NY 10022
Tel.: (332) 322-8835
yavar@bathaeedunne.com
awolinsky@bathaeedunne.com

BATHAE DUNNE LLP

Brian J. Dunne (CA 275689)
Edward M. Grauman (admitted *pro hac vice*)
901 S. MoPac Expressway
Barton Oaks Plaza I, Suite 300
Austin, TX 78746
Tel.: (213) 462-2772
bdunne@bathaeedunne.com
egrauman@bathaeedunne.com

*Interim Co-Lead Counsel for the Advertiser
Classes*

**SCOTT+SCOTT ATTORNEYS AT LAW
LLP**

Amanda F. Lawrence (admitted *pro hac vice*)
Patrick J. McGahan (admitted *pro hac vice*)
Michael P. Srodoski (admitted *pro hac vice*)
156 South Main Street, P.O. Box 192
Colchester, CT 06415
Tel.: (860) 537-5537
alawrence@scott-scott.com
pmcgahan@scott-scott.com
msrodoski@scott-scott.com

**SCOTT+SCOTT ATTORNEYS AT LAW
LLP**

Patrick J. Coughlin (CA 111070)
Carmen A. Medici (CA 248417)
Hal D. Cunningham (CA 243048)
Daniel J. Brockwell (CA 335983)
600 W. Broadway, Suite 3300
San Diego, CA 92101
Tel.: (619) 233-4565
pcoughlin@scott-scott.com
cmedici@scott-scott.com
hcunningham@scott-scott.com
dbrockwell@scott-scott.com

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

MAXIMILIAN KLEIN, et al.,

Plaintiffs,

vs.

META PLATFORMS, INC.,

Defendant.

Case No. 3:20-cv-08570-JD

Hon. James Donato

**DECLARATION OF MICHAEL A.
WILLIAMS, PH.D.**

1 I, Michael A. Williams, Ph.D., declare and state as follows:

2 1. I am a Managing Director at Berkeley Research Group, LLC. I received my M.A.
3 and Ph.D. degrees in economics from the University of Chicago. I have been retained as an
4 economic consultant by the U.S. Department of Justice, Antitrust Division, the U.S. Federal Trade
5 Commission, and the Canadian Competition Bureau. I have personal knowledge of the facts set
6 forth in this declaration and, if called as a witness, could and would testify competently to such facts
7 under oath.


8 2. I have been asked by counsel for Advertiser Plaintiffs in the above-captioned
9 litigation to provide certain expert opinions in connection with Advertiser Plaintiffs' motion for
10 class certification.

11 3. Attached hereto are the two reports I have prepared in connection with this
12 assignment: the Expert Report of Michael A. Williams, Ph.D., (**Exhibit A**) and the Reply Report of
13 Michael A. Williams, Ph.D., (**Exhibit B**).

14 4. The attached reports accurately reflect my opinions on the matters contained therein.
15

16 I declare under penalty of perjury that the foregoing is true and correct.

17 Executed on 9/14/23, in Walnut Creek, CA

18 
19 _____
20 Michael A. Williams, Ph.D.